



Animal Welfare Institute

900 Pennsylvania Avenue, SE, Washington, DC 20003

The Bureau of Land Management
National Wild Horse and Burro Advisory Board
June/July 2021 Public Meeting

RE: Public Comments to the National Wild Horse and Burro Advisory Board

Thank you for the opportunity to provide comments to the Wild Horse and Burro Advisory Board. My name is Dr. Joanna Grossman, and I am the Equine Program Manager and Senior Advisor for the Animal Welfare Institute – a national nonprofit founded in 1951, dedicated to reducing the suffering caused to animals by people. Since the late 1950s, AWI has advocated for the humane stewardship of our nation’s wild horses and burros. Indeed, AWI worked towards passage of the Wild Horse Annie Act, as well as the 1971 Wild Free-Roaming Horses and Burros Act.

We look forward to continuing to work with the new administration and Bureau of Land Management (BLM) staff to see meaningful change with the Wild Horse and Burro program. Secretary Haaland was a strong advocate for the humane treatment of our nation’s federally protected wild horses and burros as a Member of Congress, and we hope that in the coming months and years, the BLM will prioritize the on-range management of herds through widely supported fertility control options such as PZP so that horses can remain in their natural habitats. Such a paradigm shift would allow the agency to break free from the costly cycle of inhumane helicopter roundups and warehousing horses that has defined the program for far too long.

We were gratified to see the BLM walk back plans finalized during the prior administration to conduct ovariectomies on wild horses in Utah’s Confusion HMA. Lawmakers on both sides of the aisle have consistently spoken out against the BLM’s efforts to utilize a surgical procedure that the National Academy of Sciences (NAS) explicitly advised against due to the risks of trauma and infection. The Confusion plan would have marked the first time that the BLM had integrated ovariectomies into its management plan for wild horses and would have set a dangerous precedent for how herds are managed across the West.

We remain concerned, however, about the scope of roundups that the BLM is proposing to undertake. The upcoming Wyoming Checkerboard roundup – which targets over 3,000 horses for removal – would be one of the largest in BLM history, eliminating 40% of the state’s population of wild horses, including horses from a significant tourism draw in the region. This roundup is also troubling in view of the Tenth Circuit’s 2016 ruling that found that the BLM had violated both the Wild Free-Roaming Horse and Burro Act and Federal Land Policy and Management Act in removing horses from the Checkerboard – in essence treating public lands as though they were private. The sweeping scope of the roundup seems consistent with the still pending Draft Environmental Impact Statement and Resource Management Plan for the Checkerboard, which would eliminate millions of acres of designated horse habitat, suggesting the BLM is prioritizing mass removals over a proactive approach to managing herds.

Similarly, the upcoming Onaqui roundup has garnered significant attention because here again the BLM is proposing to drastically slash the numbers of an iconic herd that attracts visitors from across the country. The BLM appears to be continuing with business as usual, although as the NAS has made clear, a strategy premised on mass removals is counterproductive since it spurs compensatory reproduction, thereby guaranteeing that roundups will continue. Simply put, the BLM must move away from the trajectory outlined in its May 2020 report to Congress, which called for accelerated and costly removals for many years to come.

Finally, I want to turn briefly to the Adoption Incentive Program (AIP) scandal. Numerous Members of Congress have called for an OIG investigation into the program which pays individuals \$1,000 to adopt a wild horse and which the BLM has specifically touted as being highly successful at placing wild horses into good homes. Unfortunately, as the May 15, 2021 *New York Times* exposé revealed, the program is being abused and horses are being flipped for profit. An investigation is critical to understand the extent of the problem and to identify necessary reforms.

One thing is clear: letting horses slip through the cracks and wind up in the slaughter pipeline is not an option. This is not simply a matter of the welfare of these federally protected animals – although that’s obviously paramount; this is an issue of abiding by statutory prohibitions on the slaughter of wild horses and ensuring that federal funds are not being used for the opposite of their intended purpose – in this case, paying so-called “adopters” to funnel wild horses into the horse slaughter market.

From a broader perspective, the BLM is not going to adopt its way out of the problem of how to curb population growth. A proactive approach to implementing safe, proven, and humane fertility control is key to keeping horses on the range in their natural habitats and minimizing the exorbitant costs associated with roundups and holding.

Thank you again for the opportunity to provide input on behalf of the Animal Welfare Institute.

Sincerely,

A handwritten signature in black ink, appearing to read 'JG', written in a cursive style.

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